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July 12, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Colorado, Idaho,
Iowa, Nebraska and North Dakota, Docket No. 02-148

Dear Ms. Dortch:

In response to a request from the staff of the Department of Justice for information regarding line sharing SOC's, Qwest hereby submits the material that was provided.

The twenty-page limit does not apply as set forth in DA 02-1390.

Sincerely,

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
K. Brown

Line Sharing SOC's

- Qwest initiated an analysis of its maintenance and repair performance for line sharing. This analysis led to the creation of a new job aid, which is a checklist for the central office technician to fill out for each line sharing order to ensure that installation guidelines, including electrical continuity testing, are consistently followed. A copy of this job aid is attached.
- In addition, Qwest issued a management directive that all line sharing orders should be loaded early in the day, to allow completion by 4:00 p.m. local time. Any line sharing order not completed by 4:00 p.m. local time is placed in a jeopardy status. Steps are then taken in the Loop Provisioning Center to ensure that both the N order for billing and the C order for the line sharing are jeopardied. A report is generated on a daily basis identifying the line sharing orders that have been jeopardied to allow monitoring of process compliance.
- These changes will address CLEC concerns regarding erroneous SOC's for line sharing orders. Qwest expects that its line sharing maintenance and repair performance will improve as well.



CENTRAL OFFICE (CO) JOB AID

TITLE:		DOCUMENT NO. / Rev.
<i>LINE SHARING CHECKLIST</i>		<i>CO-CL-05-0001 / Rev. 3</i>
ASSOCIATED PROCESS:		
EFFECTIVE DATE:	REVISION DATE:	
<i>07/08/2002</i>	<i>07/01/2001</i>	
AUTHORED BY:		
Name: <i>Mike Lanoue</i> <i>Charlotte Griffiths</i> <i>(E*Media only)</i>	CUID: <i>mlanoue</i> <i>csgrif2</i>	E*Media File Name (author only): <i>5_1_Line_Sharing_Checklist_all_n</i>

Audience:

- *Central Office (CO)*

Approved by: Mike Lanoue – Lead Process Analyst, CO Staff (07/01/02)

Revision 2: Reissued 01/16/02 to add Header, Footer, Page numbers, Author information, Title updates, and Unique Number Identification for the E*Media conversion.

Revision 3: Reissued 07/01/02 to add a NOTATION column to be used by CO Personnel for Service Order work step status and to modify the Purpose statement.

1.0 Purpose

The purpose of this Job Aid is to identify the steps that need to be performed when working a Line Sharing Provisioning order from the Frame Order Management System (FOMS) document in the CO. A copy of this form is to be attached to each Line Sharing service order with a status posted in the Notation column for each work step.

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Disclosure outside of Qwest is prohibited without authorization.

STEP	OPERATION	DETAILS	NOTATIONS
1	Analyze FOMS Order Document	Print the FOMS order document and identify: 1. Line Sharing circuit 2. Copper facility. 3. Line Sharing equipment 4. Qwest service circuit elements. 5. Commitment date and time.	
2	Perform Facility qualification test	Using an H88 or equivalent test * set check line for load coils. If load coils are detected, the CO personnel will place an A9 JEP code against the order and wait for resolution notification.	
3	Pre-Wire Line Sharing circuit	Place frame cross connections for circuit: - Loop jumpers at Qwest OE and Facility.	
4	Check Qwest line.	Draw dial tone at facility and ANI*. - If incorrect assignment, verify termination and refer any problems to assignment. - If line is busy, place order wiring on hold and recheck every ½ hour until line is idle.	
5	Cut line splitter into circuit.	Lift facility jumper and terminate new jumper from line splitter. Lift jumper at OE and terminate jumper to line splitter. ANI Qwest circuit at the facility* - If ANI / Dial tone test fails, trouble shoot frame wiring and or line splitter circuit trouble. After ANI/Dial Tone test has passed perform an electrical continuity test on the data side of the splitter from the protector to the DEMARC 410 Block terminal utilizing an LSVT test set. If splitter problems are discovered jumper around the splitter and place the order in jeopardy using the following jeopardy codes: • A8 (splitter not connected on the DLEC side) • A7 (splitter not stenciled correctly) • A6 (Qwest wiring or inventory issue)	
6	Complete the FOMS order	Perform an SCM transaction on the FOMS order to complete CO provisioning steps.	

* Tests are pass/fail and do not require a test duration.

Acronyms provided in the back of the Wholesale Product Support book (CO-CL-10-0001).

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CENTRAL OFFICE (CO) JOB AID

TITLE:		DOCUMENT NO. / Rev.
<i>LINE SHARING PROVISIONING</i>		<i>CO-CL-05-0002 / Rev. 3</i>
ASSOCIATED PROCESS:		
EFFECTIVE DATE:	REVISION DATE:	
<i>07/15/2002</i>	<i>07/09/02/2002</i>	
AUTHORED BY:		
Name: <i>Mike Lanoue</i> <i>Charlotte Griffiths (E*Media only)</i>	CUID: <i>m lanoue</i> <i>csgrif2</i>	<i>E*Media</i> File Name.(author only): <i>5_2_Line_Sharing_Provisioning_all_n</i>

Audience:

- *Central Office (CO)*

Approved by: Charlotte Griffiths – Lead Process Analyst, CO Staff (12/14/01)

Revision 2: Reissued 01/16/2002 to add Header, Footer, Page numbers, Author information, Title updates, Unique Number Identification for the E*Media conversion, and change Co-Provider to CLEC.

Revision 3: Reissued 07/09/2002 to add the service order completion time of no later than 4:00 pm local time

1.0 Purpose

The purpose of this Job Aid is to define the Line Sharing product and to establish the steps that need to be performed when working a Line Sharing Provisioning order from the Frame Order Management System (FOMS) document in the CO.

PRODUCT DEFINITION:

Shared Loop (Line Sharing) is defined as making available the opportunity for the CLEC to offer ADSL qualified advanced data services within the spectrum of an existing Qwest end user's analog voice-grade service. CLEC will use the data portion of the loop while Qwest will maintain the voice portion of the loop. In addition:

- CLEC may provide the splitter from a pre-determined list. The splitter is provisioned and maintained by Qwest (similar to Virtual Collocation).

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- The end-user has dial tone originating from a Qwest switch.
- The handoff of the voice happens inside the Qwest CO. The DLEC demarc point is the data output from the POTS Splitter.
- A CLEC gains access to this service at the Qwest wire center through established Collocation arrangements.
- The combined data and voice service must comply with the standard T1.E1.4 when accepted by the industry as well as Qwest's technical requirements. More detailed specifications can be found in Qwest's technical publication # 77384.

This POTS service is installed using a basic "lift and lay" procedure. Prior to 4:00 pm (local time) on the service order Due Date, Qwest Central Office Personnel "lift" the loop from its current termination and "lays" it on a new termination (POTS Splitter) connecting to the CLEC's equipment In addition:

1. The CO will print the FOMS order and identify
 - a. The Line Sharing circuit
 - b. The copper facility
 - c. The Line Sharing equipment
 - d. The Qwest service circuit element
 - e. The commitment date and time
2. CO personnel will perform a load coil detection test utilizing an H88 or equivalent test set.
3. If a load coil is detected the CO personnel will place the order in jeopardy using the A9 jep code and wait for resolution notification
4. If the load coil detection test is negative CO personnel will pre-wire the Line Sharing circuit by placing the frame cross connects and looping the jumpers at the Qwest OE and facility.
5. The CO will draw dial tone at facility and ANI.
 - a. If assignment is incorrect, verify termination and refer any problems to assignment
 - b. If line is busy, place wiring on hold and recheck every ½ hour until line is idle.
- 6) The CO will perform the following work steps:
 - a. Lift facility jumper and terminate the new jumper from the line splitter
 - b. Lift the jumper at the OE and terminate the new jumper from the line splitter
 - c. ANI Qwest circuit at the facility. If ANI/Dial Tone test fails, trouble shoot frame wiring and or line splitter circuit trouble. After ANI/Dial Tone test has passed perform electrical continuity test utilizing the LSVT Test Set. Check for continuity from the protector to the DEMARC 410 Block terminal. The 410 Block location and terminal information is noted on the Data Line Splitter 89 Block that the cross connects were terminated on in step #4. If continuity problems are discovered it is the responsibility of the CO to resolve the problem and complete the order by the Due Date. If splitter problems are discovered jumper around the splitter and place the order in jeopardy using the following jeopardy codes:

A8	splitter not connected on the DLEC side
A7	splitter not stenciled correctly
A6	Qwest wiring or inventory issue

- 7) When the order has been completely wired and tested the CO will "SCM" the order in Switch/FOMS to complete the CO provisioning steps.

Definition of ME (miscellaneous equipment) for splitter assignment in Switch/FOMS is:

vce	voice side of port
vda	data side of port
010122	floor and relay rack
33	bay
02	shelf
005	port

Delimiters of periods will separate all elements with the exception of shelf and port id, a dash will separate these last two elements.

vce.010122.33.02-005, vda.010122.33.02-005

The frame and frame coordinates will be noted as a permanent remark such as:

F03 1G1H

F03 designates the frame, 1G is the vertical and horizontal frame location of the voice connection and 1H is the vertical and horizontal frame location of the data connection.

The ME definition applies to splitters located outside the cage (Virtual Co-location).

The definition described below applies to splitters located inside the cage (Physical Co-location).

Definition of ME (miscellaneous equipment) for splitter assignment in Switch/FOMS is:

vce.alt01.1	vda.alt01.1
vce	voice side of port
vda	data side of port
alt01	cable name
1	cable count

The frame and frame coordinates will be noted as a permanent remark such as:

F03 B10 C11

F03 designates the frame, B10 is the vertical and horizontal frame location of the voice connection and C11 is the vertical and horizontal location of the voice/data connection.

The frame blocks will be labeled VOICE AND VOICE/DATA.

NOTE: It is extremely important that the OE is connected to the Voice side of the Splitter and that the facility is connected to the Voice/Data side of the Splitter. If these cross connect terminations are reversed dial tone will still be detected at the protector but data will not be passed. Utilizing the LSVT test set will detect reversals.